

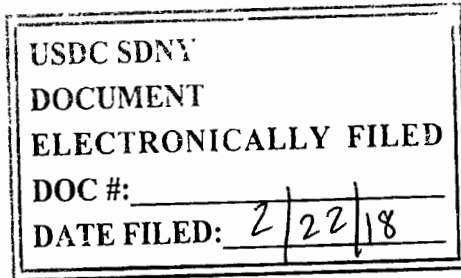


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February 22, 2018

VIA ECF

Hon. Naomi Reice Buchwald
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, New York 10007-1312

Re: Walsh v. Rigas, et al., Case No. 17-CV-4089 (NRB)

Dear Judge Buchwald:

This firm represents Defendants in the above-referenced action. We write to respectfully request leave to file a memorandum of law in support of Defendants' motion to dismiss not to exceed 50 pages in length. *Devised NRB*

As Your Honor is aware, Plaintiff's First Amended Complaint the ("FAC") is over 138 pages in length and alleges 16 causes of action against several overlapping groups of individual defendants (for reference, Plaintiff's initial Complaint was 114 pages). The facts at issue are complex and highly-detailed, and as Defendants will be moving to dismiss in full, the memorandum of law necessarily will include several intricate and well-supported legal arguments.¹ Defendants therefore respectfully submit that 50 pages is appropriate.

We have met and conferred with Plaintiff's counsel in good faith and he consents to this request on the condition that Plaintiff also be granted leave to file a memorandum of law in opposition not to exceed 50 pages. *Devised Naomi Reice Buchwald, 2/22/18*

¹ We can assure the Court that Defendants are not making this request in the proverbial dark. The current draft of Defendants' memo of law already has gone through several rounds of revisions with an eye toward cutting pages and making efficient arguments. After all of those revisions, the draft currently sits just short of 50 pages in length.



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We thank the Court for its attention to this matter.

Respectfully submitted,

/s Eric Dowell

Eric D. Dowell

cc: Thomas Sjoblom, Esq. (*via ECF*)